

The Honorable Marsha Pechman

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

HO-CHUAN CHEN and
HOSSEIN BARAHIMI,

Plaintiffs,

v.

LINDA DOUGHERTY, JENNIFER
LINDWALL, and KING COUNTY

Defendants.

Consolidated Action

No. CV4-0987P

DECLARATION OF
SUSAN B. MINDENBERGS
IN SUPPORT OF PLAINTIFF'S
REVISED MOTION FOR FEES
AND COSTS

HOSSEIN BARAHIMI,

Plaintiff,

v.

KING COUNTY and SUE OSTERHOUDT,

Defendants.

Declaration of Susan Mindenbergs
In Support of Plaintiff's Revised Motion for
Attorneys' Fees and Costs - 1

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1 Susan B. Mindenbergs does hereby certify and declare under the laws of the
2 United States of America and the State of Washington that the following is true and
3 correct and from my personal knowledge.
4

5 1. I am one of Plaintiff Barahimi's attorneys.

6 2. I have reviewed the Court's Order on Motion for Attorneys' Fees dated July 7, 2009
7 in which the Court has instructed that hours spent on the claim against King County be
8 deducted from the request and that my hours be reduced to \$200 an hour for the time I
9 spent on the issue that resulted in the Court's October 1, 2008 Order on discovery.

10 3. I have reviewed my fee petition and pre-trial briefs, pleadings, and depositions to
11 comply with the Court's Order.
12

13 4. Pursuant to the Court's Order, I am reducing my fee request by the following:

14 a. August 28, 2008 – October 1, 2008 – reduced fee request from \$300 an
15 hour to \$200 per hour for a total of 45.53 hours for time spent on the issue
16 resulting in the Court's October 1, 2008 Order for a reduction of
17 \$4,553.00.


18 b. January 2009 – March 2009 – reduced fee request by 7.69 hours devoted
19 either to *Monell* liability or research on final decision maker for a
20 reduction of \$2,307.00.
21

22 4. My fee request originally sought \$354,450.60 for attorney's fees. I have reduced that
23 request by a total of \$6,860 for a revised total of \$347,590.60 for the time I spent
24 litigating this case.

25 5. I deducted .75 hours for time spent by Jeffrey L. Needle preparing the trial brief on the
26 issue of *Monell* liability. I deducted .5 hours of time for Mr. Needle for the KIRO

1 interview he gave in April 2009. The proposed order reflects a reduction of a total of
2 \$500.00 in fees for Mr. Needle from \$109,100.00 to \$108,600.00.
3

4 DATED at Seattle, Washington, this 13th day of July 2009.

5 
6 Susan B. Mindenbergs